Southern Nuclear

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ND-21-1063
10 CFR 52.99(c)(3)

U.S. Nuclear Regulatory Commission
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Washington, DC 20555-0001

Southern Nuclear Operating Company
Vogtle Electric Generating Plant Unit 4
Notice of Uncompleted ITAAC 225-days Prior to Initial Fuel Load
Item 2.5.01.03e [Index Number 515]

Ladies and Gentlemen:

Pursuant to 10 CFR 52.99(c)(3), Southern Nuclear Operating Company hereby notifies the NRC that as of December 10, 2021, Vogtle Electric Generating Plant (VEGP) Unit 4 Uncompleted Inspections, Tests, Analyses, and Acceptance Criteria (ITAAC) Item 2.5.01.03e [Index Number 515] has not been completed greater than 225-days prior to initial fuel load. The Enclosure describes the plan for completing this ITAAC. Southern Nuclear Operating Company will, at a later date, provide additional notifications for ITAAC that have not been completed 225-days prior to initial fuel load.

Southern Nuclear Operating Company (SNC) previously submitted Notice of Uncompleted ITAAC 225-days Prior to Initial Fuel Load for Item 2.5.01.03e [Index Number 515] ND-19-0302 [ML19106A221], dated April 16, 2019. This resubmittal addresses changes made to ITAAC by Amendment 186 to the Vogtle Electric Generating Plant (VEGP) Unit 4 Combined License (COL) and supersedes ND-19-0302 for Unit 4.

This notification is informed by the guidance described in NEI 08-01, *Industry Guideline for the ITAAC Closure Process Under 10 CFR Part 52,* which was endorsed by the NRC in Regulatory Guide 1.215. In accordance with NEI 08-01, this notification includes ITAAC for which required inspections, tests, or analyses have not been performed or have been only partially completed. All ITAAC will be fully completed and all Section 52.99(c)(1) ITAAC Closure Notifications will be submitted to NRC to support the Commission finding that all acceptance criteria are met prior to plant operation, as required by 10 CFR 52.103(g).

This letter contains no new NRC regulatory commitments.

If there are any questions, please contact Kelli Roberts at 706-848-6991.

Respectfully submitted,

Kelli Roberts for MJY

Michael J. Yox
Regulatory Affairs Director Vogtle 3 & 4

Enclosure: Vogtle Electric Generating Plant (VEGP) Unit 4
Completion Plan for Uncompleted ITAAC 2.5.01.03e [Index Number 515]

MJY/TJC/sfr

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Southern Nuclear Operating Company
ND-21-1063
Enclosure

Vogtle Electric Generating Plant (VEGP) Unit 4
Completion Plan for Uncompleted ITAAC 2.5.01.03e [Index Number 515]

ITAAC Statement

Design Commitment

3.e) The sensors identified on Table 2.5.1-3 are used for DAS input and are separate from those being used by the PMS and plant control system.

Inspections, Tests, Analyses

Inspection of the as-built system will be performed except for the core exit temperature sensor installation.

Acceptance Criteria

The sensors identified on Table 2.5.1-3 are used by DAS and are separate from those being used by the PMS and plant control system.

ITAAC Completion Description

Inspection of the as-built Diverse Actuation System (DAS) is performed to demonstrate that the sensors identified in Combined License (COL) Appendix C Table 2.5.1-3 (Attachment A), except for the core exit temperature sensor installation, are used for DAS input and are separate from those being used by the Protection and Safety Monitoring System (PMS) and plant control system (PLS). Inspection of the core exit temperature sensors is performed to demonstrate that the sensors are used for DAS input and are separate from those being used by the PMS and PLS.

The DAS System Specification Document (Reference 1) requires that the sensors identified in Attachment A be used for DAS input and are separate and independent from the sensor inputs in the PMS and plant control system. Construction drawing SV4-DAS-J0-001, (Reference 2), illustrates the DAS sensor flow and indication architecture. An inspection of construction drawings and completed construction records is performed in accordance with SV4-DAS-ITR-800515 (Reference 3), to confirm that the sensors identified in Attachment A are installed, except for the core exit temperature sensor installation, per the DAS sensor input requirements of Reference 1 and are separate from those being used by the PMS and plant control system.

The inspection of the DAS Core Exit Temperature sensors is performed using a combination of methods in accordance with Reference 3. This includes inspections of plant drawings and quality release and certificate of conformance records to ensure the Core Exit Temperature sensors designated for DAS are separate from those being used by the PMS and PLS.

The inspection results are documented in Reference 3 and confirm that the sensors identified in Attachment A are used by DAS and are separate from those being used by the PMS and plant control system.

References 1 through 3 are available for NRC inspection as part of the Unit 4 ITAAC 2.5.01.03e Completion Package (Reference 4).

List of ITAAC Findings

In accordance with plant procedures for ITAAC completion, Southern Nuclear Operating Company performed a review of all ITAAC findings pertaining to the subject ITAAC and associated corrective actions. This review found there are no relevant ITAAC findings associated with the ITAAC.

References (available for NRC inspection)

1. SV4-DAS-J4-001, "AP1000 Diverse Actuation System System Design Specification", Revision 3
2. SV4-DAS-J0-001, "AP 1000 Diverse Actuation System (DAS) Sensor Flow and indication Architecture", Revision 1
3. SV4-DAS-ITR-800515, "Unit 4 Inspection Results of Diverse Actuation System (DAS) Sensor Hardware Diversity: ITAAC 2.5.01.03e NRC Index Number: 515", Revision 0
4. 2.5.01.03e-U4-CP-Rev0, "ITAAC Completion Package"
5. NEI 08-01, "Industry Guideline for the ITAAC Closure Process Under 10 CFR Part 52", Revision 5 - Corrected

Attachment A
*Excerpt from COL Table 2.5.1-3

*Equipment Name	*Tag Number
Reactor Coolant System (RCS) Hot Leg Temperature	RCS-300A
RCS Hot Leg Temperature	RCS-300B
Steam Generator 1 Wide-range Level	SGS-044
Steam Generator 1 Wide-range Level	SGS-045
Steam Generator 2 Wide-range Level	SGS-046
Steam Generator 2 Wide-range Level	SGS-047
Pressurizer Water Level	RCS-305A
Pressurizer Water Level	RCS-305B
Containment Temperature	VCS-053A
Containment Temperature	VCS-053B
Core Exit Temperature	IIS-009
Core Exit Temperature	IIS-013
Core Exit Temperature	IIS-030
Core Exit Temperature	IIS-034
Rod Control Motor Generator Voltage	PLS-001
Rod Control Motor Generator Voltage	PLS-002